

GIBSON, DUNN & CRUTCHER LLP
LAUREN R. GOLDMAN (*pro hac vice*)
lgoldman@gibsondunn.com
DARCY C. HARRIS (*pro hac vice*)
dharris@gibsondunn.com
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000
Facsimile: (212) 351-4035

COOLEY LLP
MICHAEL G. RHODES, SBN 116127
rhodesmg@cooley.com
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

ELIZABETH K. MCCLOSKEY, SBN 268184
emccloskey@gibsondunn.com
ABIGAIL A. BARRERA, SBN 301746
abarrera@gibsondunn.com
One Embarcadero Center, Suite 2600
San Francisco, CA 94111-3715
Telephone: (415) 393-8200
Facsimile: (415) 393-8306

Attorneys for Defendant Meta Platforms, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PHYLLIS NICHOLS, ROBIN COOK, and
LAWRENCE NOVIDA, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 4:24-cv-02914-JSW

**JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
PAGE LIMITS FOR CONTEMPLATED
MOTION TO DISMISS**

Date Action Filed: April 9, 2024

Honorable Jeffrey S. White

1 Pursuant to the Court’s Civil Standing Orders and Civil Local Rule 7-12, Defendant Meta Plat-
2 forms, Inc. (“Meta”) and Plaintiffs Phyllis Nichols, Robin Cook, and Lawrence Novida, by and through
3 their respective counsel of record, respectfully submit this stipulation to seek extensions on the page
4 limits applicable to the briefings on Meta’s anticipated motion to dismiss plaintiffs’ Amended Com-
5 plaint.

6 WHEREAS, on July 29, 2024, the Court granted the parties’ joint stipulation and issued an
7 order setting the briefing schedule for Meta’s anticipated motion to dismiss plaintiffs’ Amended Class
8 Action Complaint (Dkt. 25);

9 WHEREAS, on August 21, 2024, plaintiffs filed a 43-page Amended Class Action Complaint,
10 asserting eight claims for relief on behalf of an alleged nationwide class (Dkt. 26);

11 WHEREAS, the Court’s Civil Standing Orders dated October 2023 sets a 15-page limit for
12 “[a]ll briefs, whether in support of, in opposition to, or in reply to any motion”;

13 WHEREAS, no previous page limit modifications have been made in this case;

14 WHEREAS, the parties have met and conferred about the subject matter of the stipulation; and

15 WHEREAS, the parties agree that the page limitations provided for in the Court’s Civil Stand-
16 ing Orders are inadequate to fully address the factual allegations and causes of action set forth in the
17 Amended Complaint, and that the Court will benefit from more thorough briefing by the parties;

18 NOW THEREFORE, the parties hereby stipulate, subject to the approval of this Court, that:

- 19 • Meta’s memorandum of points and authorities in support of its motion to dismiss shall
20 be limited to 25 pages;
- 21 • Plaintiffs’ opposition to Meta’s motion to dismiss shall be limited to 25 pages;
- 22 • Meta’s reply in support of its motion to dismiss shall be limited to 15 pages.

23 **IT IS SO STIPULATED.**

24

25

26

27

28

1 DATED: September 19, 2024

GIBSON, DUNN & CRUTCHER LLP

2 By: /s/ Elizabeth K. McCloskey

3 Elizabeth K. McCloskey

4 ELIZABETH K. MCCLOSKEY, SBN 268184
5 emccloskey@gibsondunn.com
6 ABIGAIL A. BARRERA, SBN 301746
7 abarrera@gibsondunn.com
8 One Embarcadero Center, Suite 2600
9 San Francisco, CA 94111-3715
10 Telephone: (415) 393-4622

11 LAUREN R. GOLDMAN (*pro hac vice*)
12 lgoldman@gibsondunn.com
13 DARCY C. HARRIS (*pro hac vice*)
14 dharris@gibsondunn.com
15 200 Park Avenue
16 New York, NY 10166
17 Telephone: (212) 351-4000
18 Facsimile: (212) 351-4035

COOLEY LLP

14 By: /s/ Michael G. Rhodes

15 Michael G. Rhodes

16 MICHAEL G. RHODES, SBN 116127
17 rhodesmg@cooley.com
18 3 Embarcadero Center, 20th Floor
19 San Francisco, CA 94111-4004
20 Telephone: (415) 693-2000

21 *Attorneys for Defendant Meta Platforms, Inc.*

LYNCH CARPENTER, LLP

By: /s/ Todd D. Carpenter

Todd D. Carpenter

TODD D. CARPENTER
todd@lcllp.com
1234 Camino Del Mar
Del Mar, CA 92014
Telephone: (619) 762-1900

KATRINA CARROLL
katrina@lcllp.com
KYLE SHAMBERG
kyle@lcllp.com
Lynch Carpenter, LLP
111 W. Washington St., Ste. 1240
Chicago, IL 60602
Telephone: (312) 750-1265

FREED KANNER LONDON & MILLEN LLC

By: /s/ Jonathan M. Jagher

Jonathan M. Jagher

JONATHAN M. JAGHER
jjagher@fkmlaw.com
923 Fayette Street
Conshohocken, PA 19428
Telephone: (610) 234-6486

MCGUIRE LAW, P.C.

By: /s/ David L. Gerbie

David L. Gerbie

DAVID L. GERBIE
dgerbie@mcgpc.com
ANDREW T. HELDUT
aheldut@mcgpc.com
JOSEPH DUNKLIN
jdunklin@mcgpc.com
55 W. Wacker Drive, 9th Floor
Chicago, IL 606061
Telephone: (312) 893-7002

Attorneys for Plaintiff Phyllis Nichols

[PROPOSED] ORDER

The above Joint Stipulation and Proposed Order to Extend Page Limits Pursuant to Civil Local Rule 7-12 is GRANTED. IT IS SO ORDERED that:

- Meta's memorandum of points and authorities in support of its motion to dismiss shall be limited to 25 pages;
- Plaintiffs' opposition to Meta's motion to dismiss shall be limited to 25 pages;
- Meta's reply in support of its motion to dismiss shall be limited to 15 pages.

IT IS SO ORDERED.

Dated: _____

Hon. Jeffrey S. White
United States District Judge

CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I, Elizabeth K. McCloskey, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: September 19, 2024

By: /s/ Elizabeth K. McCloskey
Elizabeth K. McCloskey